

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

FIRST GUARANTY MORTGAGE  
CORPORATION, *et al.*,<sup>1</sup>

Debtors.

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)  
) Chapter 11  
)

) Case No. 22-10584 (CTG)  
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) (Joint Administration Requested)  
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**SECOND AMENDED<sup>2</sup> NOTICE OF AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON JULY 1, 2022 AT 10:00 A.M. (PREVAILING EASTERN TIME)  
BEFORE THE HONORABLE CRAIG T. GOLDBLATT**

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**This remote hearing will be conducted entirely over Zoom and requires all  
participants to register in advance. Please register by  
June 30, 2022 at 4:00 p.m.**

**COURTCALL WILL NOT BE USED FOR THIS HEARING.**

**Please use the following link to register for this hearing**

[https://debuscourts.zoomgov.com/meeting/register/vJltdu2grjMsHRCwvqtVUkK\\_FckvXTdCcAQ](https://debuscourts.zoomgov.com/meeting/register/vJltdu2grjMsHRCwvqtVUkK_FckvXTdCcAQ)

**After registering your appearance by Zoom, you will receive a confirmation  
email containing information about joining the hearing.**

**MATTERS GOING FORWARD:**

1. Voluntary Petitions:

- A. Maverick II Holdings, LLC (**Case No. 22-10583**) [Filed 6/30/2022] (Docket No. [1](#)).
- B. First Guaranty Mortgage Corporation (**Case No. 22-10584**) [Filed: 6/30/2022] (Docket No. [1](#)).

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors' mailing address is 5400 Tennyson Parkway, Suite 450, Plano, TX 75024.

<sup>2</sup> **Amended items will be shown in bold.**

- C. Amended Maverick II Holdings, LLC Petition to Correct Filing Form 201 [Filed 6/30/2022] (Docket No. [5](#))
- D. Amended First Guaranty Mortgage Corporation Petition to Correct Filing Form 201 [Filed 6/30/2022] (Docket No. [21](#))

### **First Day Declarations**

- 2. Declaration of Aaron Samples in Support of Chapter 11 Petition and First Day Pleadings [Filed 6/30/2022] (Docket No. [19](#)).
- 3. Declaration of Tanya Meerovich in Support of Debtors' Motions for Debtor-in-Possession Financing [Filed 6/30/2022] (Docket No. [27](#)).

**Status:** The Declarations will be relied upon as evidentiary support for the first day matters listed below.

### **First Day Motions**

- 4. Debtors' Motion for Order Directing Joint Administration of Related Chapter 11 Cases for Procedural Purposes Only [Filed: 6/30/2022] (Docket No. [2](#)).

**Status:** This matter is going forward.

- 5. Debtors' Motion Seeking Entry of an Order (I) Authorizing the Debtors to (A) File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for Each Debtor, (B) File a Consolidated List of the Debtors' Thirty Largest Unsecured Creditors, and (C) Redact Certain Personally Identifiable Information for Individual Creditors and Interest Holders and (II) Granting Related Relief [Filed: 6/30 /2022] (Docket No. [3](#)).

**Status:** This matter is going forward.

- 6. Debtors' Application for Order Appointing Kurtzman Carson Consultants LLC as Claims and Noticing Agent, Effective as of the Petition Date [Filed: 6/30/2022] (Docket No. [4](#)).

**Status:** This matter is going forward.

- 7. Motion of the Debtors for Entry of Interim and Final Orders: (I) Authorizing Use of Cash Management Procedures, Bank Accounts, and Certain Payment Methods; (II) Prohibiting Setoffs and Freezing of Bank Accounts; (III) Modifying Requirements of Section 345(b) of the Bankruptcy Code; and (IV) for Related Relief [Filed: 6/30 /2022] (Docket No. [5](#)).

### **Responses Received**

- A. **Customers Bank Omnibus Objection and Emergency Motion to Continue Debtors' (I) Cash Management Motion; (II) Cash Flow Debtor in Possession Motion; and (III) Repurchase Agreement Motion [Filed: 7/1/2022] (Docket No. [36](#))**

**Status:** This matter is going forward on an interim basis.

8. Motion of the Debtors for Entry of Order (I) Authorizing the Debtors to Continue (A) Insurance Programs and (B) Prepetition Surety Bonds, and Pay Obligations Arising Thereunder, and (II) Related Relief [Filed: 6/30/2022] (Docket No. [6](#)).

**Status:** This matter is going forward.

9. Motion of the Debtors for Entry of Interim and Final Orders (A) Authorizing the Debtors to Pay Prepetition Claims of Critical Vendors and (B) Granting Related Relief [Filed: 6/30/2022] (Docket No. [7](#))

**Status:** This matter is going forward on an interim basis.

10. Motion of the Debtors Pursuant to 11 U.S.C. §§ 105(a) and 366 and Fed. R. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (A) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [Filed: 6/30/2022] (Docket No. [8](#)).

**Status:** This matter is going forward on an interim basis.

11. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Pay Employee Obligations and (B) Continue Employee Benefit Programs, and (II) Granting Related Relief [Filed 6/30/2022] (Docket No. [9](#))

**Status:** This matter is going forward on an interim basis.

12. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Operational Cash Flow Financing; (II) Authorizing the Debtors to Use Cash Collateral; (III) Granting Liens and Superpriority Administrative Expense Status; (IV) Granting Adequate Protection; (V) Modifying the Automatic Stay; (VI) Scheduling a Final Hearing; and (VII) Granting Related Relief [Filed: 6/30/2022] (Docket No. [22](#)).

### **Responses Received**

- A. **Customers Bank Omnibus Objection and Emergency Motion to Continue Debtors' (I) Cash Management Motion; (II) Cash Flow Debtor in Possession Motion; and (III) Repurchase Agreement Motion [Filed: 7/1/2022] (Docket No. [36](#))**

**Status:** This matter is going forward on an interim basis.

- B. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Enter into Repurchase Agreement Facilities; (II) Authorizing the Debtors to Sell and Repurchase Mortgage Loans in the Ordinary Course of Business; (III) Granting Liens

and Providing Superpriority Administrative Expense Status; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing with Respect to the Relief Requested Herein; and (VI) Granting Related Relief [Filed: 6/30/2022] (Docket No. [20](#)).

**Responses Received**

- A. Customers Bank Omnibus Objection and Emergency Motion to Continue Debtors' (I) Cash Management Motion; (II) Cash Flow Debtor in Possession Motion; and (III) Repurchase Agreement Motion [Filed: 7/1/2022] (Docket No. [36](#))**

**Status:** This matter is going forward on an interim basis.

Dated: **July 1, 2022**

**PACHULSKI STANG ZIEHL & JONES LLP**

/s/ Laura Davis Jones

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